

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13  
Fran A. Rosenstock :  
Debtor : BANKRUPTCY NO.: 19-10625 ELF

**RESPONSE TO MOTION FOR RELIEF**

Debtor, by her attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1.-2. Admitted.

3. Denied. The averments set forth in these paragraphs are denied to the extent that they contain conclusions of law to which no response is necessary.

4. Denied. Movant's averment refer to documents on record before the Court. The Debtor does attest to the authenticity or veracity of said documents. Said documents speak for themselves.

5. Denied. The corresponding averments are denied to the extent that they contain conclusions of law to which no response is necessary.

6.-8. Denied. By way of further response, Debtor has paid the entire amount due to date pursuant to the lease agreement.

9. Denied. The averments set forth in these paragraphs are denied to the extent that they contain conclusions of law to which no response is necessary.

10.-11. The Movant's averments do not call for a response. To the extent Movant's averment contains any statements of fact, said statements are denied.

**WHEREFORE**, Debtor pray that the Movant's request for relief be denied.

Respectfully submitted,

Date: 5/24/2019

/s/ BrandonJ.Perloff  
BrandonJ.Perloff Esquire.  
Attorney for Debtor